

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA

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ROBERT E. COLE  
ROBERT E. COLE, P.C.  
ATTORNEY I.D. NO. 73263  
437 CHESTNUT STREET, SUITE 218  
PHILADELPHIA, PA 19106  
(215) 922-2050

Attorney For Plaintiff

U.S. DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA

OWEN J. ROGAL, D.D.S., P.C.  
d/b/a THE PAIN CENTER  
501-07 SOUTH 12<sup>TH</sup> STREET  
PHILADELPHIA, PA 19147

Plaintiff

V.

SKILSTAF, INC.  
P.O. BOX 729  
ALEXANDER CITY, AL 35011

Defendant

NO. 3:06cv711-VPM

**PLAINTIFF'S MOTION FOR PRO HAC VICE ADMISSION**

Plaintiff, Owen J. Rogal, D.D.S., P.C., d/b/a The Pain Center, by and through its undersigned counsel, moves this Court to admit, *pro hac vice*, attorney Robert E. Cole. The basis for this Motion is set forth in the annexed Affidavit of Robert E. Cole.

Respectfully submitted;

Date

Robert E. Cole, Esquire  
Attorney for Plaintiff  
Atty. I.D. No. 73263  
437 Chestnut Street, Suite 218  
Philadelphia, PA 19106  
(215) 922-2050

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Attorney For Plaintiff

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OWEN J. ROGAL, D.D.S., P.C. :  
d/b/a THE PAIN CENTER  
501-07 SOUTH 12<sup>TH</sup> STREET  
PHILADELPHIA, PA 19147

Plaintiff :

V. : NO. 3:06cv711-VPM

SKILSTAF, INC. :  
P.O. BOX 729  
ALEXANDER CITY, AL 35011

Defendant :

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**AFFIDAVIT OF ROBERT E. COLE, ESQUIRE**

Robert E. Cole, Esquire being duly sworn deposes and says:

1. I am an attorney duly licensed and admitted to practice law in the Commonwealth of Pennsylvania, having been admitted in 1994. In addition, I have been admitted to practice law in the United States District Court for the Eastern District of Pennsylvania since 2000. I am a member of good standing of the Bar of the Commonwealth of Pennsylvania and the United States District Court for the Eastern District of Pennsylvania and there are no disciplinary proceedings against me. See

Exhibit "A" attached hereto and made by reference a part hereof, Certificate of Good Standing. By way of further definition, I am filing the instant Motion as promptly as I am able as I have received in the office this day, August 28, 2006, original of certificate of good standing from local Court.

2. I submit this Affidavit in support of the accompanying application for an Order granting me permission to appear as counsel *pro hac vice* to plaintiff, Owen J. Rogal, D.D.S., P.C., d/b/a The Pain Center in the instant action.

3. I am owner of law firm Robert E. Cole, P.C., principal place of business being located at 437 Chestnut Street, Suite 218, Philadelphia, PA 19106.

4. I have extensive experience in representing plaintiff in similar claims in state and federal court, as I have been their litigation attorney for some ten (10) years.


5. Plaintiff has requested that I serve as counsel for it in pursuit of the instant action. Moreover, based on my level of familiarity with the issues and parties herein, I believe that my admission *pro hac vice* will expedite the prosecution and resolution of the action.

6. If this Court issues an Order granting me *pro hac vice* status, I will abide by all rules of the Court, and immediately notify the Clerk of any matter affecting my standing at the Bar of any Court, and pay all required fees.

7. Based on the foregoing, I respectfully request that the accompanying application for admission as counsel *pro hac vice* to plaintiff in this matter be granted.

Respectfully submitted;

8/28/06  
Date

  
\_\_\_\_\_  
Robert E. Cole, Esquire  
Attorney for Plaintiff  
Atty. I.D. No. 73263  
437 Chestnut Street, Suite 218  
Philadelphia, PA 19106  
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Attorney For Plaintiff

OWEN J. ROGAL, D.D.S., P.C. :  
d/b/a THE PAIN CENTER :  
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PHILADELPHIA, PA 19147 :

Plaintiff :

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SKILSTAF, INC. :  
P.O. BOX 729 :  
ALEXANDER CITY, AL 35011 :

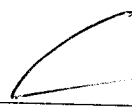
Defendant :

VERIFICATION OF SERVICE

Robert E. Cole, Esquire, verifies that on the date below, he served upon Jeanne L. Bakker, Esquire, attorney for defendant above, plaintiff's Motion for *Pro Hac Vice* Admission by depositing same with the United States Postal Service, First Class Mail and directing it to the following address:

Montgomery McCracken et al.  
123 South Broad Street  
Philadelphia, PA 19109

8/28/06  
Date

  
Robert E. Cole, Esquire  
Attorney for Plaintiff  
Atty. I.D. No. 73263  
437 Chestnut Street, Suite 218  
Philadelphia, PA 19106  
(215) 922-2050

## CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA

EASTERN DISTRICT OF PENNSYLVANIA }

I, Michael E. Kunz, Clerk of the United States District Court for the Eastern District of Pennsylvania,

DO HEREBY CERTIFY That Robert E. Cole , Bar # 73263, was duly admitted to practice in said Court on July 7, 2000, and is in good standing as a member of the bar of said Court.

DATED at Philadelphia, Pennsylvania

MICHAEL E. KUNZ

Clerk of Court

on August 25, 2006.

BY

Aida Ayala  
Aida Ayala,

Deputy Clerk

